

Mary C. Geddes
Assistant Federal Defender
FEDERAL PUBLIC DEFENDER
FOR THE DISTRICT OF ALASKA
601 West Fifth Avenue, Suite 800
Anchorage, Alaska 99501
(907) 646-3400

Attorney for Petitioner

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

JACK L. EARL, JR.,

Petitioner,

vs.

CRAIG TURNBULL,

Respondent.

Case No. 3:02-cv-0224-HRH

**MOTION FOR EXTENSION OF
TIME TO ALLOW FILING OF
MERIT BRIEF**

Filed On Shortened Time

Petitioner, Jack L. Earl, Jr., by and through counsel Mary C. Geddes, Assistant Federal Defender, moves this court for an extension of time in which to file his brief on the merits in this matter. The brief presently is due, however, counsel has been unable to complete her work on Mr. Earl's brief, prior to her scheduled leave commencing May 30. During the last two weeks of May, counsel was out of the office for five unplanned medical appointments which interfered with her ability to successfully focus on Mr. Earl's brief. This was the time frame in which counsel expected to do much of her work in the case, but, despite her best efforts, could not

submit the brief in the time frame planned. With apologies to the court, opposing counsel , and Mr. Earl, the undersigned seeks an extension of time until July 31, 2006, which will allow her three weeks after her return to the office to submit Mr. Earl's brief.

DATED this 28th day of May, 2006.

Respectfully submitted,

FEDERAL PUBLIC DEFENDER
FOR THE DISTRICT OF ALASKA

/s/ Mary C. Geddes
Assistant Federal Defender
Alaska Bar No. 8511157
601 West 5th Avenue, Suite 800
Anchorage, AK 99501
Ph: (907) 646-3400
Fax: (907) 646-3480
mary_geddes@fd.org

Certification:

I certify that on May 30, 2006, a copy of the foregoing document was served electronically on:

Kenneth M. Rosenstein, Esq.

/s/ Mary C. Geddes